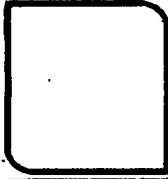


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FEDERAL ELECTION  
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**RONALD  
RUSSELL**

**CELA**

*for Congress*

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September 28, 2016

VIA US MAIL & EMAIL

Federal Election Commission  
Office of Complaints Examination  
And Legal Administration  
Attn: Mary Beth deBeau, Paralegal  
999 E Street, NW  
Washington, DC 20436

Re: MUR 7116

Answer to Complaint Against Ronald E. Russell, Candidate for  
Delegate to Congress from the United States Virgin Islands & Counterclaim

TO THE FEDERAL ELECTION COMMISSION:  
**ANSWER TO COMPLAINT**

1. Admitted.
2. Admit that Respondent was a candidate; however Respondent is no longer a candidate.
3. Admit that the election did occur on August 6, 2016.
4. Admit.
5. Admit.

6. Admit that Candidate Russell began campaigning in June 2016.

7-7.6. Respondent did not engage in all of these actions prior to reaching the \$5,000 threshold.

8-16. Admit that 11 C.F.R. sections apply to the FEC.

17. Deny.

18. Respondent registered as a candidate on August 2, 2016; Respondent's 48 hour Contribution Notice was filed on August 3, 2016; and July Quarterly Report was filed on August 2, 2016.

19. Respondent did not pass the \$5,000 threshold until on or about June 15, 2016.

20. Despite the complaint's inflammatory statements, there was no intentional violation of campaign laws. In fact, at the time of the filing, Complainant herself had violated the same provisions and had been fined.

### **AFFIRMATIVE DEFENSES**

1. Respondent was compliant with required campaign disclosures as of August 2, 2016.

2. Complainant herself has violated FEC regulations on several occasions and has been fined.

3. The Primary election is past; Respondent is no longer a candidate for office.

4. This complaint is moot and should be DISMISSED.

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**COUNTERCLAIM**

1. Delegate Plaskett may have engaged in misconduct by releasing sex tapes; taking naked selfies, and accusing Candidate Russell of these acts while knowing that the accusation was false. **See Exhibits A (4 Newspaper articles) B (3 Russell press releases), & C (Cover Letter to House Committee on Ethics) .**

2. Delegate Plaskett should be investigated for unethical conduct unbecoming of a representative for taking naked selfies and likely disseminating sex tapes in order to elicit sympathy votes in a hotly contested election. **See Exhibits A, B, & C.**

Dated: September 28, 2016

RONALD E. RUSSELL FOR CONGRESS

BY: /s/ Royette V. Russell

Royette V. Russell, Esq.  
Former Treasurer  
P.O. Box 3259  
Kingshill, VI 00851

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